

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

DR. SHIVA AYYADURAI,

Plaintiff,

v.

WILLIAM FRANCIS GALVIN, MICHELLE K. TASSINARI, DEBRA O'MALLEY, AMY COHEN, NATIONAL ASSOCIATION OF STATE ELECTION DIRECTORS, allegedly in their individual capacities, and WILLIAM FRANCIS GALVIN, in his official capacity as Secretary of State for Massachusetts,

Defendants,

and

TWITTER, INC.,

Proposed Additional  
Defendant.

Case No. 1:20-cv-11889-MLW

**PROPOSED ADDITIONAL DEFENDANT  
TWITTER INC.'S NOTICE OF INTENT TO OPPOSE JOINDER**

Proposed Additional Defendant Twitter, Inc. ("Twitter"), by and through its undersigned counsel, hereby notifies this honorable Court and the parties of its intention to oppose Plaintiffs' motion for leave to file a second amended complaint (Dkt. No. 64) joining Twitter as an additional Defendant in this action. This notice is timely filed in accordance with the terms of this Court's Order of March 25, 2021 (Dkt. No. 75) because Twitter is filing the notice within 10 days of service (Dkt. No. 80). In further conformity with that Order, Twitter will file such opposition within the time prescribed by the Order, i.e., by April 28, 2021. Twitter further states that neither the filing of this notice, the appearance of counsel, nor the filing of its forthcoming opposition is

intended to waive any applicable argument or defense that it may have relating to this action, and that it hereby expressly reserves all such arguments and defenses, including but not limited to its rights to contest personal jurisdiction and venue, and its rights to move to transfer, stay, or dismiss any claim that may be permitted to be asserted against it in this Court.

Respectfully submitted,

/s/ Felicia H. Ellsworth  
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*Attorneys for Proposed Additional  
Defendant TWITTER, INC.*

Dated: April 18, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF System will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on April 18, 2021.

/s/ *Felicia H. Ellsworth*

Felicia H. Ellsworth